

# COHEN & GREEN

December 27, 2024

Hon. Ona T. Wang, U.S.M.J.  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan Courthouse, 500 Pearl Street  
New York, New York 10007

By Electronic Filing.

**Re: Case No. 22-cv-01445, Rodney v City of New York, et al.**

Dear Judge Wang:

As the Court likely recalls, my firm, with co-counsel, represents Plaintiff in the case above. As directed by the Court, because today is the last Friday of the month, below is Plaintiff's monthly status report.

The settlement conference earlier this month was not successful. Given that, all of the discovery issues raised in the last rounds of letters remain outstanding. *See, e.g.*, ECF Nos. 219, 217, and 213.

The Court should also set a new end date for non-policy discovery (with policy discovery to follow once the appeal in *Reyes* is resolved, coordinated with the same discovery in *Reyes*), that accounts for the need to resolve the outstanding issues — which, as the Court indicated, still may have more than one “next concentric circle” of electronic discovery, and even there it may still be that “there is more that you go move to the next outer circle and the next outer circle.” 2024-02-08 Tr. at 16-25.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

*Honorific/Pronouns: Mx., they/their/them*

**COHEN&GREEN P.L.L.C.**

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cc:

All relevant parties by electronic filing.